1 2	J. SCOTT GERIEN, State Bar No. 184728 MEGAN FERRIGAN HEALY, State Bar No. DICKENSON, PEATMAN & FOGARTY 809 Coombs Street Napa, California 94559	229177	
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12			
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
15	CAVIT CANTINA VITICOLTORI	CASE NO. C 09-02470 JSW (EMC)	
16	CONSORZIO CANTINE SOCIALI DEL TRENTINO SOCIETA COOPERATIVA,	STIPULATED REQUEST FOR AN	
17	Plaintiff and	ORDER TO TAKE AN EXPERT DEPOSITION OUTSIDE OF THE	
18	Counterdefendant,	PERIOD FOR EXPERT DISCOVERY; [PROPOSED] ORDER	
19	vs.	(LROLOSED) OKDEK	
20	BROWMAN FAMILY VINEYARDS,		
21	INC.		
22	Defendant and		
23	Counterclaimant.		
24			
25	Pursuant to Civil Local Rule 6-1, the parties in this action, by signature of their counsel		
26	below, hereby stipulate and request that the Court permit Defendant to conduct the deposition of		
27 28	Plaintiff's expert, Richard Maher, on or before June 3, 2010 and that the Court extend the close of STIPULATED REQUEST FOR AN ORDER TO 1 C 09-02470 JSW (EMC) TAKE AN EXPERT DEPOSITION OUTSIDE OF THE PERIOD FOR EXPERT DISCOVERY; [PROPOSED] ORDER		

1	expert discovery from its current deadline of May 28, 2010 to June 3, 2010 for the sole purpose of		
2	permitting this deposition to take place.		
3	Pursuant to Civil Local Rule 6-2, this stipulated request is accompanied by the Declaration		
4	of J. Scott Gerien which sets forth with particularity the reasons for the requested enlargement of		
5	time, all previous modifications of time in the case, and the effect of the requested modification		
6	on the schedule for the case.		
7			
8		CKENSON, PEATMAN & FOGARTY	
9 10	Ву	J. Scott Gerign	
11		Megan Ferrigan Healy 809 Coombs Street	
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14		Attorneys for Defendant and Counterclaimant,	
15		BROWMAN FAMILY VINEYARDS, INC.	
16	Dated: MAy 12,2010 GF	RIMES & BATTERSBY, LLP	
17	By		
18	Ву	Edmund Ferdinand	
19		488 Main Avenue Norwalk, CT 06851	
20		Telephone: 203-849-8300 Facsimile: 203-849-9300	
21 22		Attorneys for Plaintiff and	
23		Counterdefendant, CAVIT CANTINA VITICOLTORI	
24		CONSORZIO CANTINE SOCIALI DEL TRENTINO SOCIETA COOPERATIVA	
25			
26			
27			
28	STIPULATED REQUEST FOR AN ORDER TO TAKE AN EXPERT DEPOSITION OUTSIDE OF THE PERIOD FOR EXPERT DISCOVERY; [PROPOSED] ORDER	2 C 09-02470 JSW (EMC)	

[PROPOSED] ORDER PURSUANT TO STIPULATION, IT IS SO ORDERED. Date: May 13, 2010 1ct Court Judge STIPULATED REQUEST FOR AN ORDER TO C 09-02470 JSW (EMC) TAKE AN EXPERT DEPOSITION OUTSIDE OF THE PERIOD FOR EXPERT DISCOVERY; [PROPOSED] ORDER